

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

1:06 CR -- 122

UNITED STATES OF AMERICA,  
Plaintiff,

v.

DEBORAH WALTERS  
Defendant.

Criminal No. \_\_\_\_\_

INDICTMENT

29 U.S.C. § 501(c)

29 U.S.C. § 439(c)

*Barnett, J*

The Grand Jury charges that:

COUNT 1

From on or about October 6, 2001 through on or about August 16, 2003 in the Southern District of Ohio the defendant, Deborah Walters, while an officer, that is, treasurer then president of AFSME Local 11, OCSEA, Chapter #8330, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to the defendant's own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$10,017.33.

All in violation of Title 29, United States Code, Section 501(c).

COUNT 2

At all times material to this Indictment AFSME Local 11, OCSEA, Chapter #8330 was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

That on or about December 31, 2001 in the Southern District of Ohio the defendant,

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U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION  
JAMES B. BARNETT  
CLERK

Deborah Walters, did willfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the Intermediate Body Quarterly Report, Fourth Quarter 2001, a record on matters required to be reported in the annual financial report of the AFSME Local 11, OCSEA, Chapter #8330 required to be filed with the Secretary of Labor.

**All in violation of Title 29, United States Code, Section 439(c).**

COUNT 3

At all times material to this Indictment AFSME Local 11, OCSEA, Chapter #8330 was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

That on or about March 31, 2002 in the Southern District of Ohio the defendant, Deborah Walters, did willfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the Intermediate Body Quarterly Report, First Quarter 2002, a record on matters required to be reported in the annual financial report of the AFSME Local 11, OCSEA, Chapter #8330 required to be filed with the Secretary of Labor.

**All in violation of Title 29, United States Code, Section 439(c).**

COUNT 4

At all times material to this Indictment AFSME Local 11, OCSEA, Chapter #8330 was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

That on or about June 30, 2002 in the Southern District of Ohio the defendant, Deborah Walters, did willfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the Intermediate Body Quarterly Report, Second Quarter 2002, a record on matters required to be reported in the annual financial report of the AFSME Local 11, OCSEA, Chapter #8330 required to be filed with the Secretary of Labor.

**All in violation of Title 29, United States Code, Section 439(c).**

COUNT 5

At all times material to this Indictment AFSME Local 11, OCSEA, Chapter #8330 was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

That on or about September 30, 2002 in the Southern District of Ohio the defendant, Deborah Walters, did willfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the Intermediate Body Quarterly Report, Third Quarter 2002, a record on matters required to be reported in the annual financial report of the AFSME Local 11, OCSEA, Chapter #8330 required to be filed with the Secretary of Labor.

**All in violation of Title 29, United States Code, Section 439(c).**

COUNT 6

At all times material to this Indictment AFSME Local 11, OCSEA, Chapter #8330 was a labor organization engaged in an industry affecting commerce within the meaning of Title 29, United States Code, Sections 402(i) and 402(j).

That on or about December 31, 2002 in the Southern District of Ohio the defendant, Deborah Walters, did willfully make and cause to be made a false entry in a record required to be kept by Section 436 of Title 29, United States Code, that is, the Intermediate Body Quarterly Report, Fourth Quarter 2002, a record on matters required to be reported in the annual financial report of the AFSME Local 11, OCSEA, Chapter #8330 required to be filed with the Secretary of Labor.

**All in violation of Title 29, United States Code, Section 439(c).**

A True Bill.

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Grand Jury Foreperson

Gregory G. Lockhart  
United States Attorney

W. Hunt  
William Hunt  
First Assistant U.S. Attorney